

Shalimar Agencies Limited
Code of Practices and Procedures for Fair Disclosure

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

[Pursuant to sub-regulation (1) of regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

(As approved by the Board of Directors of the Company through circular resolution held on 11th May, 2015)

The Board of Directors of Shalimar Agencies Limited (the "Company") are expected to manage their affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interest of all the stakeholders. The Company has since time immemorial, been committed to transparency and fairness in dealing with all the stakeholders.

Preface:

1. SEBI on 15th January, 2015, has introduced SEBI (Prohibition of Insider Trading) Regulations, 2015, to be effective from 15th May, 2015.
2. Chapter - IV of SEBI (Prohibition of Insider Trading) Regulations, 2015, Regulation 8, provides for the formulation of a "Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information" (hereinafter referred to as "Code".)
3. The Company endeavors to preserve the confidentiality of unpublished price sensitive information and to prevent the misuse of such information. To achieve these objectives, and in compliance with the aforesaid SEBI regulations, the Company notifies this Code.
4. This Code shall be applicable on all the Board of Directors of the Company with effect from 15th May, 2015.
5. Any subsequent modification and/or amendments brought about by SEBI in the aforesaid regulations shall automatically apply to this code.

Principles of Fair Disclosure for purposes of Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information:

1. There shall be prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure shall be ensured.
3. The Compliance Officer and the Director of the Company shall act as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise. It shall be ensured that such information is made generally available.
5. The Board of Directors shall ensure that appropriate and fair response shall be provided to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Board of Directors shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.


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Hoban Rao

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7. The Board of Directors shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Board shall ensure the handling of unpublished price sensitive information on a need-to-know basis.

Power of Board of Directors:

The Board of Directors of the Company will be responsible for implementation of this "Code". It reserves the right to modify this code in whole or in part, at any time without assigning any reason what so ever but within the framework of the aforementioned regulations.

Disclosure of the Code in Public Domain:

This code shall be published on the official website of the Company.

Further, this code and every subsequent amendment there to, shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.

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A circular stamp of Shalimar Agencies Limited is visible, with the name 'Mohan Rao' handwritten across it in black ink. The stamp contains the text 'SHALIMAR AGENCIES LIMITED' around the perimeter and a star symbol at the bottom.